

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

MOHAMMAD MANSOUR and MARK MOSES,

Plaintiffs,

v.

FACTORY DIRECT OF SECAUCUS, LLC  
d/b/a ASHLEY FURNITURE HOMESTORE,

Defendant.

No. 13 Civ. 2443 (SDW)(MCA)

**DECLARATION OF DENISE RUBIN GLATTER IN OPPOSITION TO  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Denise Rubin Glatter, declare upon personal knowledge and under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct.

1. I am an attorney at The Ottinger Firm, P.C. (the "Firm") in New York, New York, Plaintiffs' counsel herein. I make this declaration in opposition to Defendant's Motion for Summary Judgment.
2. I make these statements based on personal knowledge and would so testify if called as a witness at trial.
3. Attached hereto as "Exhibit A" is a true and correct copy of those portions of the transcript of the December 29, 2014 deposition of Plaintiff Mohammed Mansour which are cited in Plaintiffs' Counter-Statement of Disputed and Undisputed Facts and Separate Statement of Disputed and Undisputed Facts ("Plaintiffs' Counter Statement") and Memorandum of Law in Opposition to Defendants Motion for Summary Judgment ("Plaintiffs' Memorandum").
4. Attached hereto as "Exhibit B" is a true and correct copy of those portions

of the July 30, 2014 deposition of Plaintiff Mark Moses which are cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

5. Attached hereto as "Exhibit C" is a true and correct copy of those portions of the August 1, 2014 deposition of Eugene Chrinian which are cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

6. Attached hereto as "Exhibit D" is a true and correct copy of those portions of the November 14, 2014 deposition of Salvatore Sciarrino which are cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

7. Attached hereto as "Exhibit E" is a true and correct copy of those portions of the December 19, 2014 deposition of Jerry Cook which are cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

8. Attached hereto as "Exhibit F" is a true and correct copy of those portions of the November 13, 2014 deposition of Aazel Bautista which are cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

9. Attached hereto as "Exhibit G" is a true and correct copy of the Affidavit of Plaintiff Mohammed Mansour, dated February 27, 2015, which is cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

10. Attached hereto as "Exhibit H" is a true and correct copy of the Affidavit of Plaintiff Mark Moses, dated February 27, 2015, which is cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

11. Attached hereto as "Exhibit I" is a true and correct copy of Plaintiffs' document production bates numbered Mansour 0111 to 0127, which is cited in Plaintiffs' Counter Statement and Plaintiffs' Memorandum.

12. Attached hereto as “Exhibit J” is a true and correct copy of Defendant’s document production bates numbered D55, which is cited in Plaintiffs’ Counter Statement and Plaintiffs’ Memorandum.

13. Attached hereto as “Exhibit K” is a true and correct copy of Plaintiffs’ document production bates numbered Mansour0029-34, which is cited in Plaintiffs’ Counter Statement and Plaintiffs’ Memorandum.

14. Attached hereto as “Exhibit L” is a true and correct copy of Defendant’s document production bates numbered D31-33, which is cited in Plaintiffs’ Counter Statement and Plaintiffs’ Memorandum.

15. Attached hereto as “Exhibit M” is a true and correct copy of Plaintiffs’ document production bates numbered Mansour0022-23, which is cited in Plaintiffs’ Counter Statement and Plaintiffs’ Memorandum.

16. Attached hereto as “Exhibit N” is a true and correct copy of Defendant’s document production bates numbered D58-60, which is cited in Plaintiffs’ Counter Statement and Plaintiffs’ Memorandum.

17. I hereby declare under penalty of perjury that the foregoing statements made by me are true based on my personal knowledge

Dated: February 27, 2015  
New York, New York

Respectfully submitted,

**THE OTTINGER FIRM, P.C.**

By: /s/ Denise Rubin Glatter  
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